



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Sarah Brown, Treasurer  
Ohio State Republican Party  
211 S Fifth Street  
Columbus, OH 43215

JAN 16 2001

Identification Number: C00162339

Reference: October Quarterly Report (7/01/00-9/30/00)

Dear Ms. Brown:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report discloses a receipt in the amount of \$378,968.57 from the Republican National Committee. However, these funds appear to have been disbursed by the 1999 State Victory Fund for which you have provided a memo Schedule A. Please amend your report to clarify this discrepancy.

-Schedule A supporting Line 12 discloses a transfer(s)-in from Republican National Committee. Schedule B supporting Line 21(b) reflects payments for exempt activities. Please be advised that a state or local party committee may pay for campaign materials (such as bumper stickers) that are distributed by volunteers in connection with activity on behalf of the party's nominees in a general election. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used, including distribution by direct mail (mailings by a commercial vendor or from commercial lists); all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR §100.7(b)(15) and (17) and to the Campaign Guide for Party Committees.

Please clarify the nature of the transfer(s)-in and subsequent payments for the aforementioned disbursement(s). If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B or F supporting Line 23 or 25 of the Detailed Summary Page as appropriate.

-Schedule H4 of your report discloses disbursements for the "Administrative/Voter Drive" category which use a ratio that is inconsistent with the ratio disclosed on Schedule H1 for the 2000 election cycle. The ballot composition ratio for the allocation of administrative and generic voter drive expenses should be the same for the full two-year election cycle. Please amend your report to clarify this apparent discrepancy.

Please note that if your non-federal account has overpaid your federal account because of this miscalculation, it will be necessary to immediately transfer these funds back to the non-federal account. While the Commission may take further legal action concerning any impermissible overpayments by the non-federal account, your prompt action will be taken into consideration.

-Schedule H2 indicates the allocation ratio for "Cleveland Victory 2000" was revised during the reporting period. Please provide the date of the fundraising program or event. In the case of a telemarketing or direct mail campaign, the "date" is the last day of the telemarketing campaign, or the day on which the final direct mail solicitations are mailed. 11 CFR §106.5(f)(2) In the event that an excessive non-federal transfer was received, the excessive amount should be transferred back to your non-federal account.

-On Schedule H4 of your report you have disclosed several lump sum payments for fundraising and administrative expenses. In addition, you have provided attachments disclosing the individual vendors receiving these payments. However, the sum of the entries itemized on Schedule H4 as lump sum payments total \$1,673,452.28, while the attachments provided total only \$1,624,312.56. Please amend your report to clarify this discrepancy.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the purpose for several joint expenditures to various vendors. Note that the unique identifying code for an event is not

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considered an adequate description of purpose. Please amend your report to include this missing information.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include a unique identifying title or code for the payment(s) made to "US Postmaster". 11 CFR §104.10. Please amend this report to provide a unique identifying title or code for each entry omitting this information.

-Schedule H4 of your report discloses a ratio adjustment for "Cincinnati Victory 2000". However, Schedule H2 does not disclose a revised ratio for this event. Please amend your report to include the revised ratio and the date the revision took effect.

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive and Cleveland Victory 2000 are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

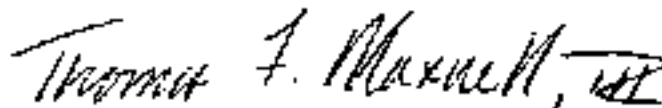
-Payments made to credit card companies must identify the original vendors from which you have purchased an item or service if your payments to these vendors have exceeded \$200 this year. Please amend your report by providing the mailing address, date, amount and purpose of such payments as required by 11 CFR §104.9(b).

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports

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Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script that reads "Thomas F. Maxwell, III". The signature is written in dark ink and is positioned above the printed name.

Thomas F. Maxwell, III  
Reports Analyst  
Reports Analysis Division

